

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of :

AN ADJUSTMENT OF THE GAS AND ELECTRIC)
RATES, TERMS AND CONDITIONS OF) CASE NO. 2003-00433
LOUISVILLE GAS & ELECTRIC COMPANY)

**MOTION OF STAND ENERGY CORPORATION
FOR LEAVE TO BE GRANTED FULL INTERVENTION**

1. On December 29, 2003, Louisville Gas and Electric Company ("LG&E") filed an application for a proposed general increases in electric and gas base rates.
2. Stand Energy Corporation ("SEC"), a privately held Kentucky Corporation, is engaged in the marketing of natural gas to numerous end use customers throughout the Midwest, including the Commonwealth of Kentucky. SEC currently serves transportation customers behind LG&E and Columbia Gas of Kentucky, including facilities owned by the Commonwealth of Kentucky. SEC saved several Commonwealth of Kentucky facilities almost \$1 million in natural gas costs in the last fiscal year versus the sales price the facilities would have paid the relevant utility. Similar savings would be possible for all large natural gas customers if the tariffs of local distribution companies like LG&E promoted transportation of customer owned gas rather than punishing gas transportation customers and their suppliers with unreasonably high fees and charges.
3. SEC's principal place of business is: 1077 Celestial Street, Suite #110, Cincinnati, OH 45202-1629.

4. Because of differing commercial goals and direction, and the fact that SEC is a privately held marketer with absolutely no connection to any regulated utility in any state, SEC avers that no other participant can adequately represent or protect its interests in this case.

5. SEC asserts that its twenty (20) years of experience in gas transportation issues may lead to the presentation of issues or to the development of facts that may assist the Commission and will not unduly complicate, disrupt or delay the proceedings. SEC has previously participated as an Intervenor in gas regulatory cases before the KPUC. SEC seeks the right to present testimony if appropriate, cross-examine witnesses, and file briefs at the appropriate time or participate in oral argument if oral argument is granted.

6. Wherefore, SEC respectfully requests that the Commission grant it full Intervenor status pursuant to KRS 278.310 and 807 KAR 5:001 §3(8) and be treated as a party hereto with right to have notice of and appear at the taking of testimony, cross-examine witnesses, and be heard through the undersigned General Counsel. SEC does not require a modification of the existing procedural schedule to conduct discovery. SEC will conform to the existing procedural schedule.

Respectfully Submitted,


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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was hand-delivered or mailed, first class postage prepaid, this 4th day of May 2004, to the following parties of record:

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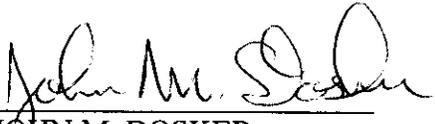
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